
MELODY JOY CANTU AND DR. RODRIGO
CANTU,

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

Case No. 20-cv-0746-JKP-HJB

**DECLARATION OF TOR
EKELAND IN SUPPORT OF
MOTION TO COMPEL AS
COUNSEL FOR MELODY CANTU
AND DR. RODRIGO CANTU**

I, Tor Ekeland, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney duly admitted to practice law in the United States and am admitted to this practice in this court, Pro Hac Vice. I am the managing partner of Tor Ekeland Law, PLLC.
2. I write these statements on behalf of my clients Melody Joy Cantu and Dr. Rodrigo David Cantu (“Cantus”), the Plaintiffs in this matter, alongside Michael Hassard, an associate at Tor Ekeland Law, and attorney Rain Minns of Rain Minns Law Firm in the above-captioned action. I submit this declaration in support of the Motion to Compel Discovery in this case.
3. On January 14, 2022, Plaintiffs served Co-Defendants Dr. Sandra Guerra and Digital Forensics, LLC (“DFC”) discovery requests.
4. To date, Co-Defendants have not provided a single document following our requests for production.
5. Plaintiffs have requested the contract between Dr. Guerra and DFC, which is at the heart of this case.
6. Counsel for Co-Defendant Dr. Guerra offered to enter into an Agreed Confidentiality and Protective Order in place even to consider providing Plaintiffs with the documents.

7. We do not agree that an Agreed Confidentiality and Protective Order for the discovery is necessary to provide the discovery in this matter.
8. Parties in this matter plan to move forward with depositions and require discovery documents to fully prepare their questions for Co-Defendants.
9. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Dated: June 9, 2022

/s/ Tor Ekeland